

### REMARKS

Claims 1-37 are pending in the application and stand rejected. In particular, claims 1-15 and 19-37 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,119,147 to Hashimoto and claims 16-18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Hashimoto in view of U.S. Patent No. 6,119, 147 to Toomey.

Applicant respectfully submits that at the very minimum, claims 1, 19 and 29 are patentable and non-obvious over Hashimoto. For instance, the Office Action fails to provide a reasonable explanation to refute Applicants' contention that Hashimoto does not disclose or suggest a system or method for synchronizing multi-modal interactions, comprising, *inter alia*, a multi-modal application comprising at least a first mode process that enables user interaction with the application in a first modality and a second mode process that enables user interaction with the application in a second modality, as commonly recited in claims 1, 19 and 29.

Indeed, in the Response to Arguments section, the Examiner relies on, e.g., FIG. 6 of Hashimoto to explain how Hashimoto discloses a multi-modal application. However, Examiner's argument is based on a seemingly improper construction of the claim language in an attempt to fit Hashimoto to the claims. Indeed, claims 1, 19 and 29 commonly recite a multimodal application comprising first and second mode processes, which claim features are not specifically addressed by the Examiner in formulating the rejections, and which claim features in any event are not disclosed by Hashimoto.

FIG. 1 of Applicants' specification discloses a multi-modal application (12) (Application A) comprising a first (speech) mode process (12a) and a second (GUI) mode process (12b). In accordance with the claimed inventions, the multi-modal application (12) with multiple mode processes (12a) and (12b) is an application that is written for multiple modalities, which can be synchronized via a multi-modal shell application (18/20). This is to be contrasted with separate,

mono-mode GUI and Speech mode applications (14) and (16) that can communicate via the MM shell application (see, e.g., relevant description on page 11, line 13, through page 12, line 6; and page 14, lines 3-16 of Applicants' specification).

In this regard, when the claims are properly construed, Hashimoto clearly does not disclose a *multi-modal application* comprising a first mode process and second mode process, as contemplated by the claimed invention. There is nothing in Hashimoto that discloses or suggests that the application programs (2) or the SRS (1) in FIG. 6 are different application mode processes of a multi-modal application, which are written for different user-interaction modalities supported by the multi-modal application, as contemplated by the claimed invention.

In fact, Examiner admits on page 12 of the Office Action that the SRS (1) of FIG. 6 simply acts as an interface of an application (20) to transfer unit inputs into recognizable results which are transferred to the application (2). In this regard, the SRS (1) and the application (2) may be construed, at most, as being separate, mono-mode applications which interact via message communication to provide a speech interface for a GUI application. Thus, for at least these reasons, Examiner cannot reasonably agree that SRS (1) is a speech mode process of a multi-modal application, as contemplated by the claimed inventions.

Moreover, it is respectfully submitted that the remainder of Examiner's claims rejections are premised, in part, on the improper claim interpretation as noted above. As such, the rejections are legally deficient for at least the same reasons given for claims 1, 19 and 29 above. For instance, in this regard, Hashimoto does not disclose or suggest *a multi-modal shell for managing and synchronizing information exchanges between the first and second mode processes of the multi-modal application to enable a synchronized multi-modal interaction with the application*, as recited in claim 1. Furthermore, with respect to claims 19 and 29, it is

respectfully submitted that Hashimoto does not disclose or suggest *updating application states or device states associated with the first and second processes*, as recited in claims 19 and 29.

Accordingly, claims 1, 19 and 29 are patently distinct and patentable over Hashimoto. Furthermore, claims that depend from claims 1, 19 and 29 are patentable over Hashimoto at least for the same reasons given for respective base claims 1, 19 and 29. Further, with respect to the rejection of claim 16-18 based on the combination of Hashimoto and Toomey, such rejection is legally deficient at least to the extent that Hashimoto does not disclose or suggest the inventions of claim 1, from which claims 16-18 depend. Furthermore, Toomey is distinguishable from the claimed inventions at least for the reasons previously cited by Applicant. Therefore, withdrawal of the obviousness rejections is respectfully requested.

Respectfully submitted,



Frank V. DeRosa  
Reg. No. 43,584

F.CHAU & ASSOCIATES, LLC  
130 Woodbury Road  
Woodbury, New York 11797  
Tel: (516) 692-8888  
FAX: (516) 692-8889